

Kenneth A. Rosen
Michael S. Etkin
Bruce S. Nathan
Vincent A. D'Agostino
Ira Levee
Jason Teele
David Banker
LOWENSTEIN SANDLER PC
65 Livingston Avenue
Roseland, New Jersey 07068
Tel: (973) 597-2500
Fax: (973) 597-2400
-and-
1251 Avenue of the Americas
New York, New York 10020
Tel: (212) 262-6700
Fax: (212) 262-7402

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re: :
: **Chapter 11**
:
Lehman Brothers Holdings Inc., et al., :
: **Case No. 08- 13555 (JMP)**
:
Debtors. : **(Jointly Administered)**
:
-----X

**VERIFIED STATEMENT OF LOWENSTEIN SANDLER PC
PURSUANT TO BANKRUPTCY RULE 2019(a)**

Vincent A. D'Agostino, Esq., a member of the law firm of Lowenstein Sandler PC (the "LS Firm"), attorneys for Cellco Partnership d/b/a Verizon Wireless ("VZW"); Avaya Inc. ("Avaya"); Dow Jones & Company, Factiva, Inc., as successor in interest to Dow Jones Reuters Business Interactive LLC, Factiva Limited f/k/a Dow Jones Reuters Business Interactive Limited (collectively "DJC/Factiva"); EnergyCo LLC and EnergyCo Marketing and Trading (collectively, "EC"); Alameda County Employees'

Retirement Association ("Lead Plaintiffs"); PNMR Services Company and First Choice Power LP (collectively, "FCP"); Reliant Energy Services, Inc. and Reliant Energy Power Supply, LLC (collectively, "Reliant"); Spiral Binding Company Inc. ("Spiral"), and Midwest Independent System Operator ("MISO"), (all collectively, the "Creditors") makes the following disclosure pursuant to 28 U.S.C. §1746 and Rule 2019 of the Federal Rules of Bankruptcy Procedure:

1. The LS firm was retained separately by each of the Creditors in connection with the captioned bankruptcy cases.

2. VZW is a pre-petition creditor of the above-referenced debtors (the "Debtors"). In addition, VZW continues to provide telecommunications services to the Debtors. VZW has retained the LS Firm for the purpose of preserving and enforcing its rights and claims against the Debtors. VZW resides at One Verizon Way, Basking Ridge, NJ 07920.

3. Avaya is a pre-petition creditor of the Debtors. Avaya has retained the LS Firm for the purpose of preserving and enforcing its rights and claims against the Debtors. Avaya resides at 211 Mt. Airy Road, Basking Ridge, NJ 07920.

4. DJC/Factiva are pre-petition creditors of the Debtors. DJC/Factiva have retained the LS Firm for the purpose of preserving and enforcing their rights and claims against the Debtors. DJC/Factiva reside at 4300 U.S. Route One, Monmouth Junction, NJ 08852.

5. EC is a pre-petition creditor of the Debtors. EC has retained the LS Firm for the purpose of preserving and enforcing its rights and claims against the Debtors. EC resides at 225 East John Carpenter Freeway, Irving, TX 75062.

6. The Lead Plaintiffs are Alameda County Employees' Retirement Association, Government of Guam Retirement Fund, Northern Ireland Local Governmental Officers Superannuation Committee, City of Edinburgh Council as Administering Authority of the Lothian Pension Fund, and Operating Engineers Local 3 Trust Fund, the court-appointed lead plaintiffs in the consolidated securities class action pending in the United States District Court for the Southern District of New York (the "District Court") captioned, *Operative Plasterers and Cement Masons International Association Local 262 Annuity Fund v. Lehman Brothers Holdings, Inc. et al.*, Case No. 08-05523 (LAK). The Lead Plaintiffs are creditors, equity holders and parties in interest by virtue of the fact that they lost millions of dollars as result of their purchases or acquisitions of the Debtor's securities. The District Court approved the retention of Bernstein Litowitz Berger and Grossman, LLP ("BLBG") and Shrifin, Barroway, Topaz & Kessler, LLP ("SBTK") as Co-Lead Counsel to the Lead Plaintiffs. BLBG resides at 1285 Avenue of the Americas, New York, NY 10019. SBTK resides at 280 King of Prussia Road, Radnor, PA 19087. The LS Firm was retained by the Lead Plaintiffs as bankruptcy counsel to pursue all avenues in these bankruptcy proceedings to protect the rights of the Lead Plaintiffs and the putative class.

7. FCP is a pre-petition creditor of the Debtors. FCP has retained the LS Firm for the purpose of preserving and enforcing its rights and claims against the Debtors. FCP resides at 225 East John Carpenter Freeway, Irving, TX 75062.

8. Reliant is a pre-petition creditor of the Debtors. Reliant has retained the LS Firm for the purpose of preserving and enforcing its rights and claims against the Debtors. Reliant resides at 1000 Main Street, Houston, TX 77002.

9. Spiral is a pre-petition creditor of the Debtors. Spiral has retained the LS Firm for the purpose of preserving and enforcing its rights and claims against the Debtors. Spiral resides at One Maltese Drive, Totowa, NJ 07511.

10. MISO is a pre-petition creditor of the Debtors. MISO has retained the LS Firm for the purpose of preserving and enforcing its rights and claims against the Debtors. The LS Firm has filed a motion to obtain relief from the automatic stay on behalf of MISO for the purpose of allowing MISO to exercise its rights of setoff under certain contracts between MISO and the Debtors. MISO resides at 701 City Center Drive Carmel, Indiana 46032.

11. The LS Firm reserves the right to supplement or amend this statement at any time in the future.

I verify under penalty or perjury that the foregoing is true and correct to the best of my knowledge, information and belief. If asked to testify regarding the foregoing facts, I would testify as described herein.

/s/ Vincent A. D'Agostino
Vincent A. D'Agostino, Esq.
LOWENSTEIN SANDLER PC
65 Livingston Avenue
Roseland, New Jersey 07068
Tel: (973) 597-2500
Fax: (973) 597-2400
-and-
1251 Avenue of the Americas
New York, New York 10020
Tel: (212) 262-6700
Fax: (212) 262-7402

Dated: December 3, 2008